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Attorneys for
GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF
GOOGLE LLC'S PORTION OF JOINT
LETTER BRIEF RE: GOOGLE'S SEARCH
TERMS**

Judge: Hon. Alex G. Tse
Courtroom: A – 15th Floor
Trial Date: Not Yet Set

1 I, EDUARDO E. SANTACANA, declare:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Willkie Farr & Gallagher LLP, located at One Front Street, San Francisco,
4 California 94111, counsel for Defendant Google LLC (“Google”) in the above-captioned action.
5 Unless otherwise stated, the facts I set forth in this declaration are based on my personal
6 knowledge. If called to testify as a witness, I could and would testify competently to such facts
7 under oath.

8 2. I submit this declaration in support of Google’s portion of the Parties’ Joint Letter
9 Brief re: Google’s Search Terms.

10 3. **Exhibit C** is a true and correct copy of a chart that was compiled at my direction.
11 An associate in my office and an attorney on Google’s in-house legal team, working under my
12 supervision and at my direction, created the chart. The chart identifies all of the search terms
13 Google has employed to date to the best of my knowledge. The chart also identifies hit counts for
14 certain search strings proposed by Google and/or Plaintiffs, for all documents not yet selected for
15 review based on prior search strings. The “total” number of hits identified at pages 1, 4, 7, 9, 10,
16 12, and 14 represent the total number of additional documents that would be identified for review
17 for each Topic of search terms after accounting for documents that contain multiple search terms.
18 These hit counts and totals are accurate to the best of my knowledge.

19 4. At my direction, my team has calculated an expected time for review of documents
20 considering both past experience in and circumstances unique to this case. Based on that, I am
21 informed and believe that it will take an estimated 16,900 hours to review the 595,342 documents
22 that would be selected for review if the Court adopts Plaintiff’s proposed order. Based on an
23 industry average cost of \$60 per hour for reviewers, my team has calculated that this review would
24 cost Google approximately \$1,014,000.

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49628105.1

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed January 6, 2022, at San Francisco, California.

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5 /s/ Eduardo E. Santacana
6 EDUARDO E. SANTACANA
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